

QUIJANO & ENNIS
ATTORNEYS AT LAW
381 PARK AVENUE SOUTH
SUITE 701
NEW YORK, NEW YORK 10016

TELEPHONE: (212) 686-0666
FAX: (212) 686-8690

Peter Enrique Quijano
Nancy Lee Ennis

October 1, 2007

By Fax (212) 805 - 7948

Honorable Richard J. Holwell
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: U.S. v. Francis et al., incl. Lennie Nurse, 07 Cr. 672 (RJH)

Dear Judge Holwell:

I am the attorney for the defendant Lennie Nurse in the above-referenced matter, having been appointed to represent him pursuant to the provisions of the Criminal Justice Act, 18 U.S.C. § 3006A. The purpose of this letter is respectfully to request that the Court order a temporary modification to the terms and conditions of his pre-trial release. Presently, Mr. Nurse's travel is restricted to the Southern and Eastern Districts of New York, and New Jersey. Mr. Nurse respectfully requests that this condition be temporarily modified to permit him to fly to Miami, Florida, on the night of October 5, 2007, to attend a family get-together, and to return on October 9, 2007. I have conferred with Assistant United States Attorney Antonia Apps, who has advised me that the Government has no objection to this request. I have spoken with Pre-Trial Services Officer Dina Naftaliev, who also has advised me that she approves of this request. Mr. Nurse has supplied the details of his itinerary to the Government and to Pre-Trial Services. Thank you very much for your consideration of this request.

Respectfully submitted,

Nancy Lee Ennis
Nancy Lee Ennis

cc: Assistant U. S. Attorney Antonia Apps, by e-mail antonia.apps@usdoj.gov
Pre-Trial Services Officer Dina Naftaliev, by fax: (212) 805 - 4176